

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

**JURY DEMANDED**

**DECLARATION OF MARC FENSTER IN SUPPORT OF  
PLAINTIFF HEADWATER RESEARCH LLC'S MOTION TO STRIKE  
PORTIONS OF THE EXPERT OPINIONS OF DR. DAN SCHONFELD**

1. I, Marc Fenster, declare as follows.
2. I am counsel for Headwater Research LLC (“Headwater”) in the above-captioned action. I provide this declaration in support of Headwater’s Motion to Strike Portions of the Expert Opinions of Dr. Dan Schonfeld. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.
3. Attached as Exhibit 1 is a true and correct copy of the opening report of Samsung’s technical expert, Dr. Dan Schonfeld, dated June 4, 2025.
4. Attached as Exhibit 2 is a true and correct copy of the rebuttal report of Samsung’s technical expert, Dr. Dan Schonfeld, dated June 20, 2025.
5. Attached as Exhibit 3 is a true and correct copy of Samsung’s Fifth Supplemental Objections and Responses to Headwater Research LLC’s First Set of Interrogatories, dated May 16, 2025.
6. Attached as Exhibit 4 is a true and correct copy of Headwater’s First Set of Interrogatories to Samsung, dated September 13, 2024.
7. Attached as Exhibit 5 is a true and correct copy of a statutory disclaimer for certain claims of U.S. Patent No. 9,179,359, dated January 2, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 14, 2025 at Marshall, Texas

By: /s/ Marc Fenster  
Marc Fenster

**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2025, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a)(3).

/s/ Marc Fenster

Marc Fenster